

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
LUBBOCK DIVISION**

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IN RE:

Reagor-Dykes Motors, LP,  
Reagor-Dykes Imports, LP,  
Reagor-Dykes Amarillo, LP,  
Reagor-Dykes Auto Company, LP,  
Reagor-Dykes Plainview, LP,  
Reagor-Dykes Floydada, LP,  
Reagor Auto Mall, Ltd.,  
Reagor-Dykes Snyder, L.P.,  
Reagor-Dykes Auto Mall I LLC,  
Reagor-Dykes II LLC, and  
Reagor-Dykes III LLC,

Case No. 18-50214-rlj-11  
Jointly Administered

*Debtors.*

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Dennis Faulkner, Creditors' Trustee,

*Plaintiff,*

vs.

Adversary No. 20-05005-rlj

Ford Motor Credit Company LLC,

*Defendant.*

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**DEFENDANT FORD MOTOR CREDIT COMPANY LLC'S OBJECTIONS AND  
COUNTERDESIGNATIONS TO FIRST AMENDED DEPOSITION EXCERPT  
DESIGNATIONS OF PLAINTIFF DENNIS FAULKNER, CREDITORS' TRUSTEE**

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Defendant Ford Motor Credit Company LLC (“Ford Credit”) respectfully submits the following Objections and Counterdesignations to the first amended deposition testimony designated by Creditors’ Trustee Dennis Faulkner (the “Trustee”), pursuant to the Court’s Third Amended Scheduling Order Confirming Trial Dates and Setting the Pre-Trial and Post-Trial Deadlines [*see* Doc. 404].

To the extent some or all of the deposition testimony designated by the Trustee was previously designated “Confidential” or “Highly Confidential” pursuant to the Court’s Confidentiality and Protective Order [Doc. 134], the Court’s October 27, 2021 Order [Doc. 200], and the confidentiality designations served by Ford Credit, such designated testimony shall be afforded the confidentiality protections provided by the Court’s July 21, 2021 Confidentiality and Protective Order [*see* Doc. 134].

These counterdesignations do not include deposition testimony that Ford Credit may use solely for impeachment or rebuttal. Ford Credit also reserves the right to designate additional deposition testimony or modify these objections and counterdesignations in response to developments in the case. Further, Ford Credit objects to the use of deposition testimony for witnesses who were called as live witnesses prior to the time the deposition testimony is used or who are or were available to appear in court at or before the time the witness’s testimony is played.

<b>WILLIAM F. DELANEY, III</b> <b>November 10, 2021</b>		
<b>Trustee’s Designations</b>	<b>Ford Credit’s Objections</b>	<b>Ford Credit’s Counterdesignations</b>
18:12-20:20	18:24-19:4 – FRE 403 (misleading)  19:10-20 – FRE 403 (mischaracterization)  19:21-20:4 – FRE 403 (needlessly cumulative); FRE 611 (harassment)	20:21-21:12

<b>WILLIAM F. DELANEY, III</b> <b>November 10, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
	20:5-20 – FRE 403 (needlessly cumulative, confusing); FRE 611 (harassment)	
21:13-23:03	21:13-24 – FRE 403 (mischaracterization, needlessly cumulative)  22:7-18 – FRE 403 (mischaracterization, needlessly cumulative); FRE 611 (harassment)  22:19-23:3 – FRE 403 (mischaracterization)	23:4-8
23:09-12	No Objection	23:13-25:25
24:01-05	No Objection	24:6-26:6
33:09-34:05	No Objection	34:19-22
37:13-38:04	No Objection	38:11-23
39:02-40:10	No Objection	40:19-41:6
44:24-45:15	No Objection	44:13-23; 45:16-46:18
46:19-51:15	46:19-47:17 – FRE 403 (mischaracterization)  47:18-23 – FRE 403 (confusing the issues)  47:24-48:9 – FRE 401, 402 (irrelevant); FRE 701 (improper lay witness opinion)  48:14-22 – FRE 401, 402 (irrelevant); FRE 701 (improper lay witness opinion)  48:23-49:13 – FRE 403 (misleading, mischaracterization, confusing)  51:1-15 – FRE 403 (mischaracterization)	
62:18-68:05 (beginning with “Do”)	62:18-63:1 – FRE 403 (vague)  64:7-17 – FRE 403 (mischaracterization, confusing the issues, misleading, argumentative)	68:6-13

<b>WILLIAM F. DELANEY, III</b> <b>November 10, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
	<p>64:18-65:4 – FRE 403 (mischaracterization, argumentative)</p> <p>65:9 – FRE 401, 402 (not evidence)</p> <p>65:13-19 – FRE 401, 402 (irrelevant)</p> <p>65:20-24 – FRE 401, 402 (irrelevant); FRE 403 (argumentative, misleading)</p> <p>65:25-66:7 – FRE 401, 402 (irrelevant); FRE 403 (confusing the issues); FRE 611 (harassment)</p> <p>66:8-22 – FRE 403 (mischaracterization)</p> <p>67:6-13 – FRE 401, 402 (irrelevant); FRE 403 (confusing the issues, misleading, mischaracterization); FRE 611 (harassment)</p> <p>67:14-21 – FRE 403 (mischaracterization, argumentative)</p>	
70:19-71:01	FRE 403 (misleading, mischaracterization)	71:2-11
71:12-72:08 (beginning with “My question”)	71:12-19 – FRE 403 (mischaracterization)	
74:09-76:16	<p>74:9-18 – FRE 401, 402 (irrelevant)</p> <p>74:19-75:2 – FRE 403 (argumentative, mischaracterization)</p>	
86:13-99:10	<p>86:20-87:9 – FRE 403 (misleading, confusing, mischaracterization, argumentative)</p> <p>87:10-23 – FRE 602 (lacks personal knowledge); FRE 701 (improper lay witness opinion)</p> <p>87:24-89:4 – FRE 401, 402 (irrelevant); FRE 403 (misleading, confusing the issues)</p>	

<b>WILLIAM F. DELANEY, III</b> <b>November 10, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
	89:24-90:11 – FRE 403 (mischaracterization)  90:12-20 – FRE 602 (lacks personal knowledge)  90:21-91:4 – FRE 403 (mischaracterization, argumentative, misleading)  91:15-92:11 – FRE 403 (confusing, mischaracterization, argumentative)  93:7-12 – FRE 403 (misleading)  94:1-9 – FRE 403 (mischaracterization)  97:3-10 – FRE 403 (misleading, mischaracterization, confusing the issues); FRE 602 (lacks personal knowledge)	
99:18-101:22 (beginning with “Let”)	101:14-22 – FRE 403 (mischaracterization, misleading)	99:11-17
102:10-119:17	102:13-103:9 – FRE 403 (misleading, mischaracterization)  103:17-104:3 – FRE 403 (misleading, mischaracterization)  104:17-23 – FRE 403 (mischaracterization)  104:24-105:7 – FRE 403 (argumentative); FRE 602 (lacks personal knowledge)  107:7-108:19 – FRE 401, 402 (irrelevant)  108:20-25 – FRE 403 (mischaracterization, misleading, argumentative)  109:14-111:18 – FRE 602 (lacks personal knowledge)	119:18-121:24

<b>WILLIAM F. DELANEY, III</b> <b>November 10, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
	<p>111:19-113:17 – FRE 401, 402 (irrelevant); FRE 403 (confusing the issues. misleading, mischaracterization, argumentative)</p> <p>114:4-9 – FRE 401, 402 (irrelevant); FRE 403 (confusing the issues)</p> <p>114:17-25 – FRE 602 (lacks personal knowledge)</p> <p>115:8-24 – FRE 403 (mischaracterization, misleading, confusing, compound, argumentative)</p> <p>118:3-16 – FRE 403 (mischaracterization, compound)</p> <p>119:5-17 – FRE 403 (argumentative, not a question, mischaracterization).</p>	
121:25-127:04	<p>122:17-25 – FRE 403 (cumulative, argumentative)</p> <p>123:18-126:23 – FRE 401, 402 (irrelevant)</p> <p>126:24-127:2 – FRE 401, 402 (irrelevant); FRE 403 (mischaracterization, argumentative)</p>	
129:14-131:06	<p>129:20-130:6 – FRE 403 (mischaracterization, argumentative)</p> <p>130:7-12 – FRE 403 (misleading); FRE 602 (lacks personal knowledge)</p> <p>130:13-16 – FRE 403 (confusing the issues, misleading)</p>	
133:12-134:06	133:18-134:6 – FRE 403 (confusing, misleading, mischaracterization, argumentative)	134:7-11
139:18-140:12	No Objection	134:12-139:17
143:25-146:20	144:9-15 – FRE 403 (mischaracterization)	

<b>WILLIAM F. DELANEY, III</b> <b>November 10, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
	144:16-22 – FRE 602 (lacks personal knowledge)  145:16-25 – FRE 602 (lacks personal knowledge)	
165:08-173:09	168:7-16 – FRE 403 (misleading, mischaracterization)  169:8-14 – FRE 403 (misleading, mischaracterization)  169:24-170:14 – FRE 403 mischaracterization, argumentative)  170:15-23 – FRE 403 (argumentative)  171:10-172:12 – FRE 403 (argumentative, confusing, compound); FRE 611 (harassment)  172:13-173:9 – FRE 403 (wasting time, argumentative, mischaracterization); FRE 611 (harassment)	173:10-174:11
174:12-175:03	174:12-175:3 – FRE 403 (misleading, mischaracterization, cumulative, argumentative); FRE 611 (harassment)	175:4-8
175:09-179:05 (beginning with “Let”)	177:19-178:8 – FRE 602 (lacks personal knowledge)  178:9-13 – FRE 403 (mischaracterization, misleading, argumentative)  178:14-179:1 – FRE 403 (confusing, misleading, mischaracterization)	
182:19-188:18	183:18-24 – FRE 602 (lacks personal knowledge)  184:10-15 – FRE 401, 402 (irrelevant)  184:16-22 – FRE 403 (mischaracterization, misleading); FRE 611 (harassment)	

<b>WILLIAM F. DELANEY, III November 10, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
	<p>184:23-185:4 – FRE 602 (lacks personal knowledge); FRE 801, 802 (hearsay)</p> <p>185:12-21 – FRE 403 (mischaracterization)</p> <p>185:22-186:9 – FRE 403 (mischaracterization); FRE 701 (improper lay witness opinion)</p> <p>186:10-17 – FRE 403 (mischaracterization)</p>	
192:07-194:09	<p>192:13-20 – FRE 403 (misleading, mischaracterization)</p> <p>193:4-14 – FRE 403 (misleading, mischaracterization)</p> <p>193:15-194:1 – FRE 602 (lacks personal knowledge); FRE 701 (improper lay witness opinion)</p>	
194:15-203:16	<p>196:15-24 – FRE 403 (mischaracterization)</p> <p>201:11-19 – FRE 602 (lacks personal knowledge)</p> <p>201:23-202:4 – FRE 403 (mischaracterization); FRE 602 (lacks personal knowledge)</p> <p>202:10-18 – FRE 403 (mischaracterization); FRE 602 (lacks personal knowledge)</p> <p>203:6-14 – FRE 403 (mischaracterization)</p>	
203:22-211:25	<p>204:18-205:4 – FRE 602 (lacks personal knowledge)</p> <p>206:24-207:9 – FRE 602 (lacks personal knowledge); FRE 701 (improper lay witness opinion)</p> <p>207:25-208:7 – FRE 403 (confusing)</p>	



<b>WILLIAM F. DELANEY, III</b> <b>November 10, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
	<p>208:8-19 – FRE 403 (confusing); FRE 602 (lacks personal knowledge)</p> <p>208:20-209:4 – FRE 403 (mischaracterization)</p> <p>209:5-16 – FRE 602 (lacks personal knowledge)</p> <p>209:17-210:8 – FRE 701 (improper lay witness opinion)</p> <p>211:3-25 – FRE 403 (mischaracterization)</p>	
212:11-215:07	<p>212:11-213:7 – FRE 403 (confusing, mischaracterization); FRE 701 (lacks personal knowledge)</p> <p>213:16-214:8 – FRE 403 (mischaracterization); FRE 611 (harassment)</p>	
226:20-234:05	<p>229:4-15 – FRE 403 (confusing, compound, harassment); FRE 611 (harassment)</p> <p>229:16-230:15 – FRE 403 (misleading, mischaracterization)</p> <p>231:7-19 – FRE 403 (misleading, mischaracterization)</p>	
234:14-244:05	238:3-239:14 – FRE 401, 402 (irrelevant, not a question, lawyer commentary is not evidence); FRE 403 (argumentative, needlessly cumulative)	244:6-24
244:25-247:25	247:18-25 – FRE 403 (mischaracterization)	
248:10-249:05 (ending with “audit.”)	248:10-24 – FRE 403 (mischaracterization)	
249:12-252:08	250:17-252:8 – FRE 403 (mischaracterization)	252:9-17
254:20-267:03 (beginning with “So Ms. Lundy”)	257:12-23 – FRE 403 (mischaracterization, misleading, confusing)	267:4-10

<b>WILLIAM F. DELANEY, III</b> <b>November 10, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
	<p>258:13-21 – FRE 401, 402 (irrelevant, lawyer commentary is not evidence); FRE 403 (mischaracterization, argumentative)</p> <p>258:22-259:11 – FRE 403 (argumentative, misleading, mischaracterization, confusing)</p> <p>260:25-261:9 – FRE 403 (mischaracterization, misleading, argumentative)</p> <p>262:11-263:2 – FRE 602 (lacks personal knowledge)</p> <p>263:3-10 – FRE 401, 402 (irrelevant, lawyer commentary is not evidence); FRE 403 (misleading, mischaracterization, argumentative. cumulative)</p> <p>263:14-25 – FRE 401, 402 (irrelevant, lawyer commentary is not evidence); FRE 403 (misleading, mischaracterization, argumentative. cumulative)</p> <p>264:16-265:7 – FRE 401, 402 (irrelevant, lawyer commentary is not evidence); FRE 403 (misleading, mischaracterization, argumentative. cumulative)</p> <p>266:4-14 – FRE 401, 402 (irrelevant, lawyer commentary is not evidence); FRE 403 (misleading, mischaracterization, argumentative. cumulative)</p> <p>266:15-22 – FRE 401, 402 (irrelevant, lawyer commentary is not evidence); FRE 403 (misleading, mischaracterization, argumentative. cumulative)</p> <p>266:23-267:3 – FRE 401, 402 (irrelevant, lawyer commentary is not evidence); FRE 403 (misleading, mischaracterization, argumentative. cumulative)</p>	

<b>WILLIAM F. DELANEY, III</b> <b>November 10, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
267:11-270:23	267:22-268:5 – FRE 403 (mischaracterization, compound)	
271:07-273:17	272:2-15 – FRE 403 (misleading, mischaracterization, confuses the issues); FRE 701 (improper lay witness opinion)	
274:14-287:06	275:12-19 – FRE 403 (misleading)  276:2-10 – FRE 403 (mischaracterization)  280:1-9 – FRE 403 (argumentative, misleading)  280:10-19 – FRE 602 (lacks personal knowledge)  282:6-24 – FRE 403 (mischaracterization)  285:15-286:9 – FRE 403 (mischaracterization, misleading)  286:10-15 – FRE 602 (lacks personal knowledge)  286:16-20 – FRE 602 (lacks personal knowledge); FRE 701 (improper lay witness opinion)  286:21-287:6 – FRE 403 (mischaracterization, misleading)	
287:19-299:06	290:1-5 – FRE 403 (misleading, mischaracterization); FRE 602 (lacks personal knowledge)  291:15-21 – FRE 403 (mischaracterization)  294:7-295:7 – FRE 403 (misleading, argumentative, mischaracterization)  297:4-9 – FRE 403 (misleading, mischaracterization)	299:7-17

<b>WILLIAM F. DELANEY, III</b> <b>November 10, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
	298:19-299:6 – FRE 403 (misleading, mischaracterization)	
299:18-302:24 (beginning with “My”)	299:18-300:6 – FRE 403 (misleading, mischaracterization, confusing the issues)  302:6-12 – FRE 602 (lacks personal knowledge)	

<b>MARY DORSEY</b> <b>October 22, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
13:23-14:10	No Objection	14:11-15:2
15:03-14	No Objection	15:15-24
18:13-19:07	No Objection	19:8-13
22:04-24:02	No Objection	20:8-10; 21:6-16; 24:3-13
27:17-28:23	No Objection	27:8-16
32:21-34:03	33:3-34:3 – FRE 701 (improper lay witness opinion)	35:21-36:10
36:20-24	No Objection	36:25-37:3
37:04-12	No Objection	37:13-22
37:23-39:22	No Objection	40:3-25
41:13-17	No Objection	41:7-12 (beginning with “Did you”)
42:09-13	No Objection	42:14-22
44:09-18	No Objection	44:4-8; 44:19-25
46:10-13	No Objection	46:14-47:4
54:08-55:07	FRE 401, 402 (irrelevant)	
56:04-16	FRE 401, 402 (irrelevant)	
57:03-25	FRE 401, 402 (irrelevant)	
60:22-23	FRE 401, 402 (irrelevant)	
64:16-65:16	FRE 401, 402 (irrelevant)	

<b>MARY DORSEY October 22, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
68:17-69:19	FRE 401, 402 (irrelevant)	
70:24-71:06	FRE 401, 402 (irrelevant)	
71:14-21	FRE 401, 402 (irrelevant)	
72:10-13 (beginning with "I'm asking")	FRE 403 (needlessly cumulative)	
74:09-74:22	FRE 401, 402 (irrelevant)	
76:04-18	FRE 401, 402 (irrelevant)	75:19-76:3
78:20-80:01 (beginning with we've talked")	78:20-79:9 – FRE 401, 402 (irrelevant); FRE 403 (misleading, mischaracterization, argumentative)  79:10-80:1 – FRE 401, 402 (irrelevant); FRE 403 (confusing the issues, misleading)	78:11-19
80:21-81:03	FRE 401, 402 (irrelevant); FRE 403 (misleading); FRE 602 (lacks personal knowledge)	80:12-20 (beginning with "How many")
86:09-20	FRE 401, 402 (irrelevant)	
102:15-103:14	FRE 401, 402 (irrelevant)	
109:17-23	FRE 401, 402 (irrelevant)	109:24-110:1
110:02-10	FRE 401, 402 (irrelevant)	
123:17-125:02	FRE 401, 402 (irrelevant)	
149:02-17	FRE 401, 402 (irrelevant)	
150:02-20	No Objection	149:24-150:1
154:21-157:10	154:21-155:4 – FRE 602 (lacks personal knowledge); FRE 701 (improper lay witness opinion)  155:5-20 – FRE 403 (confusing, misleading, mischaracterization, argumentative); FRE 602 (lacks personal knowledge).  157:3-10 – FRE 403 (mischaracterization)	157:11-18
159:10-160:19	159:10-160:6 – FRE 401, 402 (irrelevant); FRE 403 (misleading, mischaracterization, argumentative)	

<b>MARY DORSEY October 22, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
	160:7-19 – FRE 401, 402 (irrelevant); FRE 403 (misleading, mischaracterization, confusing the issues)	
166:16-168:20 (beginning with “If there”)	167:2-19 – FRE 401, 402 (irrelevant to the extent testimony concerns pre-2016 information); FRE 403 (misleading, mischaracterization)  168:14-20 – FRE 401, 402 (irrelevant); FRE 403 (misleading, mischaracterization, confuses the issues, argumentative); FRE 602 (lacks personal knowledge)	
169:08-13	FRE 403 (misleading, mischaracterization, argumentative)	
183:08-186:24	183:24-186:1 – FRE 401, 402 (irrelevant)	
192:02-12	FRE 401, 402 (irrelevant)	
199:21-200:08	FRE 401, 402 (irrelevant)	
201:02-202:20	FRE 401, 402 (irrelevant)	
270:21-273:13	271:24-272:7 – FRE 403 (mischaracterization)  273:2-7 – FRE 403 (mischaracterization, argumentative)	

<b>RENE LEAL October 29, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
14:08-24	No Objection	14:25-15:15
33:23-35:22	No Objection	32:20-33:22
36:05-37:16 (beginning with “How”)	36:5-37:1 – FRE 401, 402 (irrelevant)  37:2-16 – FRE 401, 402 (irrelevant); FRE 602 (lacks personal knowledge)	
44:18-46:24	45:6-10 – FRE 403 (mischaracterization, argumentative)	

<b>RENE LEAL</b> <b>October 29, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
60:18-62:07	60:18-61:4 – FRE 403 (mischaracterization)  61:10-16 – FRE 403 (misleading, argumentative)	
81:18-82:14	82:5-14 – FRE 701 (improper lay witness opinion)	
176:25-178:03	176:25-177:6 – FRE 403 (misleading, mischaracterization)  177:17-20 – FRE 403 (mischaracterization, misleading, argumentative)	
180:16-182:23	182:8-13 – FRE 403 (mischaracterization, misleading)	182:24-184:1
203:04-207:20	203:9-23 – FRE 403 (mischaracterization, argumentative)  204:5-11 – FRE 403 (mischaracterization); FRE 602 (lacks personal knowledge)  204:18-24 – FRE 602 (lacks personal knowledge)  207:1-10 – FRE 602 (lacks personal knowledge)	
212:10-219:02	213:9-15 – foundation, exhibit not introduced  214:3-20 – FRE 403 (mischaracterization, misleading); FRE 602 (lacks personal knowledge)  218:9-219:2 – FRE 403 (argumentative, misleading, mischaracterization); FRE 602 (lacks personal knowledge)	
219:10-226:19	219:24-220:5 – FRE 403 (mischaracterization, misleading)  220:18-23 – FRE 602 (lacks personal knowledge)	

<b>RENE LEAL</b> <b>October 29, 2021</b>		
<b>Trustee's Designations</b>	<b>Ford Credit's Objections</b>	<b>Ford Credit's Counterdesignations</b>
	222:16-20 – FRE 403 (mischaracterization, misleading)  222:21-223:5 – FRE 403 (mischaracterization)  225:15-20 – FRE 403 (mischaracterization); FRE 602 (lacks personal knowledge)	
227:18-229:07	228:1-8 – FRE 401, 402 (irrelevant); FRE 403 (confusing the issues)  228:18-24 – FRE 401, 402 (irrelevant); FRE 403 (confusing the issues)	
246:16-248:06	247:13-22 – FRE 403 (misleading, mischaracterization)  247:23-248:6 – FRE 403 (misleading, mischaracterization)	



Dated: June 6, 2023

Respectfully submitted,

**BAKER BOTTS L.L.P.**

By: /s/ Kevin M. Sadler

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***ATTORNEYS FOR DEFENDANT  
FORD MOTOR CREDIT COMPANY LLC***

**CERTIFICATE OF SERVICE**

I hereby certify that on June 6, 2023, a copy of the foregoing document was filed electronically. Notice of this filing will be sent to all parties through the Court's Electronic Case Filing System ("ECF"). Parties may access this filing through ECF.

/s/ Kevin M. Sadler

Kevin M. Sadler